

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MEIRAV KESHER HADADI, LTD.,

Plaintiff and Counter-defendant,

v.

**ZIPCAR INC., MOBILITY INC. d/b/a
FLEXCAR and I-GO,**

Defendants and Counter-plaintiffs.

Case No. 07C7282

The Honorable John W. Darrah,
Judge Presiding

Magistrate Judge Denlow

JOINT MOTION TO AMEND THE SCHEDULING ORDER

Plaintiff Meirav Kesher Hadadi, Ltd. and defendants Zipcar Inc., Mobility Inc. d/b/a Flexcar and I-GO (collectively, “Zipcar”), by their attorneys, hereby jointly request that the Court amend the scheduling order entered by the Court on March 27, 2008 following the initial status conference (the “Scheduling Order”). In support of this joint motion, the parties state as follows:

1. On March 27, 2008, the parties appeared before the Court for an initial status conference.
2. At the initial status conference, the parties discussed – and the Court allowed – various deadlines in the case, some of which are reflected in the Court’s Scheduling Order. The parties believe that the additional dates discussed at the conference should be part of the Scheduling Order.
3. The parties therefore respectfully request that the Scheduling Order should be amended to read as follows:¹

¹ New dates are in bold typeface.

<u>Event</u>	<u>Date</u>
Parties to exchange Rule 26(a)(1) disclosures	April 17, 2008
Parties to exchange list of claim limitations in dispute	May 1, 2008
Parties to exchange proposed constructions of claim limitations in dispute and identify extrinsic evidence to support such constructions	June 2, 2008
Parties to file joint claim construction chart listing proposed constructions and identifying any extrinsic evidence parties intend to use with respect to claim construction	June 30, 2008
Parties to file opening claim construction briefs	July 28, 2008
Parties to file responsive claim construction briefs	August 25, 2008
Parties to file reply briefs to responsive claim construction briefs	September 9, 2008
Status conference and ruling regarding claim construction	November 5, 2008 at 9:00 a.m.
Parties to amend pleadings to join additional parties	October 2, 2008
Fact discovery to be completed	December 5, 2008 (all discovery must be initiated to be completed by this date)
Parties to serve expert reports for any issue on which a party carries the burden of proof	January 20, 2009
Parties to serve rebuttal expert reports	February 20, 2009
Expert discovery to be completed	March 20, 2009²
Parties to file dispositive motions	May 15, 2009
Parties to file responses to dispositive motions	June 11, 2009
Parties to file reply briefs to responses to dispositive motions	June 25, 2009
Status conference	August 11, 2009 at 9:00 a.m.

² The Scheduling Order currently states that discovery is ordered closed on March 20, 2009. The schedule set forth herein specifies deadlines for close of fact and close of expert discovery.

<u>Event</u>	<u>Date</u>
Parties to file pretrial order	September 16, 2009
Pretrial conference	September 30, 2009 at 1:30 p.m.
Trial	October 5, 2009 at 9:00 a.m.

4. Adding the above dates to the Scheduling Order will not impact the dates otherwise set by the Court in the Scheduling Order.

5. The parties are submitting a joint proposed order for electronic entry in accordance with the Court's Standing Order. The proposed order includes the dates set forth in the Scheduling Order, as well as the above dates.

WHEREFORE, the parties respectfully request that the Court grant the parties' Joint Motion to Amend the Scheduling Order.

Dated: April 3, 2008

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